DOCKET SECTION

BEFORE THE POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

DOCKET NO. R97-1

POSTAL RATE AND FEE CHANGES, 1997

FOLLOW-UP INTERROGATORY OF UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS HATFIELD (UPS/USPS-T16-41)

(October 9, 1997)

Pursuant to the Commission's Special Rules of Practice, United Parcel Service hereby serves the following interrogatory and request for production of documents directed to United States Postal Service witness Hatfield (UPS/USPS-T16-41).

Respectfully submitted,

John E. McKeever Albert P. Parker, II Stephanie Richman

Attorneys for United Parcel Service

SCHNADER HARRISON SEGAL & LEWIS LLP 1600 Market Street, Suite 3600 Philadelphia, Pennsylvania 19103-7286 (215) 751-2200 1225 Eye Street, N.W., Suite 600 Washington, D.C. 20005-3914 (202) 463-2900

Of Counsel,

FOLLOW-UP INTERROGATORY OF UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS HATFIELD

UPS/USPS-T16-41. In your response to UPS/USPS-T16-26, you state that the "origin used to determine the GCD for DBMC pieces is the BMC or other facility where the pieces are dropshipped." However, page 4 of instruction DM-470-80-3, Mail Acceptance at Bulk Mail Center (supplied as an attachment to the Response to UPS/USPS-T28-35), contains the following statement with respect to Parcel Post mail: "Entry Post Offices: Any post office in BMC area. All mail entered by a customer in a BMC in a day must have the same entry post office." Please explain the apparent discrepancy between your answer and DM-470-80-3.

UPS/USPS-T16-42. Please refer to your response to UPS/USPS-T37-33, part (d).

- (a) Confirm that Parcel Post mail, eligible to receive the DSCF discount, that is dropshipped at a DSCF that is co-located with a DDU will receive the DDU Parcel Post discount for the portion of the mail shipment destinating to the DDU co-located with the DSCF. If not confirmed, please explain.
- (b) Confirm that 100 percent of Parcel Post mail that receives the DSCF Parcel Post discount (and not the DDU Parcel Post discount) will incur a transportation leg from the DSCF to the destination AO. If not confirmed, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.

Albert P. Parker, II

Dated: October 9, 1997

Philadelphia, PA